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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

MIRIAM GOLDBERG,  
a/k/a Marina Sokolovskaya,

Plaintiff,

v.

TEACHBK, INC., ILYA KISELEV and  
ANDREI BURTSEV,

Defendants.

Case No.: 3:24-cv-4525

**COMPLAINT FOR DEFAMATION**

**JURY TRIAL DEMANDED**

1 Plaintiff Miriam Goldberg asserts the following claims against Defendants  
2 TeachBK, Inc., Ilya Kiselev, and Andrei Burtsev:

3 **NATURE OF THE CASE**

4 1. This is a defamation action by Ms. Goldberg against Defendants based on  
5 their online campaign of lies accusing Ms. Goldberg—the marketing director for a U.S.  
6 immigration law firm that assists Russian asylum seekers—of being a Kremlin agent  
7 who sends clients’ personal information to the Russian government, among other lies.  
8 Defendants, who provide their own services to Russian asylum seekers, engaged in this  
9 campaign to harm the reputation of their perceived competition.

10 **PARTIES, JURISDICTION AND VENUE**

11 2. Plaintiff Miriam Goldberg is a Russian émigré—who came to the United  
12 States because of her opposition to Russian President Vladimir Putin—and U.S. citizen  
13 who resides in Brooklyn, New York. Ms. Goldberg is known professionally as Marina  
14 Sokolovskaya, which borrows from her birth name and her grandmother’s surname. She  
15 is the Development Director and Intake Manager for the New York office of Modern Law  
16 Group, a U.S.-based immigration law firm. As part of her business role, Ms. Goldberg  
17 posts YouTube videos and Instagram posts and reels discussing immigration matters  
18 based on topics decided by her employer. Ms. Goldberg works to help asylum seekers  
19 from the post-Soviet space, and in recent years has helped Russians and Ukrainians seek  
20 asylum here in the wake of the Russian invasion of Ukraine. She works with Russians  
21 who risk persecution at home for their anti-war beliefs and helps them flee persecution  
22 in the country that she now calls home. As Defendants know based on their prior  
23 representations, Ms. Goldberg is not an agent of the Kremlin or the Russian government.  
24 To suggest that she has any support for or connection with the Russian government is  
25 false, defamatory, and personally hurtful to her and the hard work she does to help  
26 asylum seekers. In addition to her work with the Modern Law Group, Ms. Goldberg is  
27 also engaged in active volunteer efforts to help find missing persons. Over the course of  
28 the last ten years, Ms. Goldberg has helped locate and identify more than 120 missing

1 persons. She also created a documentary film titled *Я не вернусь / I Won't Be Back* about  
2 those volunteer efforts. For purposes of this action, she is a private figure.

3 3. On information and belief, Defendant Ilya Kiselev is an individual who  
4 resides in Mountain View, California.

5 4. On information and belief, Defendant Andrei Burtsev is an individual who  
6 resides in Rocklin, California. At all times material to the allegations in the Complaint,  
7 he resided and conducted business in Mountain View, California.

8 5. Defendants Kiselev and Burtsev collectively run and administer (1) the  
9 YouTube channel “TeachBK – Immigration” located at  
10 <https://www.youtube.com/@TeachBK> (the “YouTube Channel”), (2) various Telegram  
11 channels, and (3) the website teachbk.com, on which they offer help to Russians who are  
12 seeking to move to the United States. Their website provides information on travel to  
13 Mexico, purchasing vehicles, preparing for asylum interviews, and recommendations to  
14 the two U.S.-based immigration lawyers who often appear on the YouTube Channel.  
15 Defendants Kiselev and Burtsev incorporated this venture as TeachBK, Inc.

16 6. Defendant TeachBK, Inc. is a dissolved Florida profit corporation, with its  
17 principal offices in Hallandale Beach, Florida and Mountain View, California.  
18 Defendants Burtsev and Kiselev were TeachBK, Inc.’s sole owners and shareholders.  
19 Although they dissolved the corporation on June 28, 2024, they continue to administer  
20 the YouTube Channel, social media, and website under the “TeachBK” moniker post-  
21 dissolution.

22 7. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1332.  
23 There exists complete diversity between the parties, as Ms. Goldberg is a resident of New  
24 York, Defendants Kiselev and Burtsev are residents of California, and Defendant  
25 TeachBK’s residence (Florida and California) is disregarded as a former entity. The  
26 amount in controversy at issue in this matter exceeds \$75,000.

1           8.       This Court has personal jurisdiction over Defendants and venue is proper  
2 in the Northern District of California under 28 U.S.C. § 1391(b) because Defendant  
3 Kiselev resides in this District and Defendants’ wrongful acts alleged herein occurred in  
4 this District.

5           9.       Prior to filing suit, Ms. Goldberg, through counsel, issued a retraction letter  
6 to Defendants, who failed to retract any of the statements, images or videos at issue here.

7                               **INTRADISTRICT ASSIGNMENT**

8           10.      Pursuant to Civil Local Rule 3-2(d), this diversity action shall be assigned  
9 to assigned to the San Jose Division, as a substantial part of the events or omissions  
10 giving rise to the claim occurred within Santa Clara County, such that the claims arise  
11 therefrom.

12                           **GENERAL ALLEGATIONS**

13           11.      In October 2020, Defendants created the <teachbk.com> domain and  
14 website, and several months later, in February 2021, they launched their YouTube  
15 Channel. On their website, YouTube Channel, and Telegram, Defendants explain that  
16 they provide immigration services—“Assistance in protecting the right to political  
17 asylum. Immigration to the USA”—although neither Kiselev nor Burtsev are licensed  
18 attorneys. They promote asylum as a visa-less option to relocation in the United States.

19           12.      Instead, they provide a series of ancillary services to Russians who are  
20 seeking to immigrate to the United States. Defendants have used their website, YouTube  
21 Channel, Telegram, and other social media to encourage Russian asylum seekers to  
22 purchase packages where Defendants help arrange flights from Dubai to Mexico, the  
23 purchase of vehicles in Mexico to cross the border into the United States, assistance on  
24 “how to get in” to the United States from abroad, as well as with assistance in preparing  
25 for asylum proceedings.

26           13.      Because neither Kiselev nor Burtsev is an attorney, they refer their  
27 customers to the lawyers their website lists as “recommendations” for services that they  
28 cannot provide, like appearing in immigration court. However, according to their

1 website, Defendants provide a series of services that are legal in nature. For example,  
2 Defendants help their clients prepare for interviews with immigration officials.  
3 According to a WhatsApp voice memo authored by Kiselev, Defendants also help their  
4 clients compile their case for an asylum application by telling them “what has to be in it,  
5 what falls under a category and what doesn’t.” They claim they “help shape [the client’s]  
6 narrative” for 15,000 Rubles, but that the consultation “does not constitute a legal  
7 consultation in the United States.” Defendants also offer “asylum preparation” which  
8 includes a legal assessment of the case’s strengths and weaknesses for 28,000 Rubles.  
9 Again, Defendants caution with an asterisk that this package—to provide a “legal  
10 assessment”—is not a legal consultation. Defendants also provide a comprehensive  
11 package for 50,000 Rubles, which helps clients understand their legal case and help  
12 assess how to purchase tickets and what to do at the border and after crossing. They  
13 provide the same disclaimer that they are not providing a legal service.

14 14. Since the creation of the YouTube Channel, Defendants have posted more  
15 than 1,000 videos. The videos are in Russian and discuss immigration to the United  
16 States, often featuring the two lawyers Defendants promote on their website for  
17 immigration services—Alex Tovarian and Raisa Stepanova. They have more than  
18 100,000 followers and nine million views.

19 15. To ensure that TeachBK remains, in Kiselev’s words, “at the top,”  
20 Defendants have morphed their social media presence from simply promoting  
21 themselves and their associates to denigrating those whom they perceive as competitors.

22 16. Specifically, Defendants have taken aim at Ms. Goldberg, who posts online  
23 about immigration and asylum and is affiliated with a law firm. Their statements and  
24 visual representations about Ms. Goldberg are calculated to frighten asylum seekers  
25 away from her employer by tarnishing her reputation. They have done so by falsely and  
26 maliciously telling their viewers that she sends asylum applicants’ personal information  
27 to the Russian government and is a Kremlin agent.  
28

17. Defendants' campaign of lies began in or around January 2023, when they began posting attack videos about Ms. Goldberg on their YouTube Channel and posting negative comments through Telegram and other social media channels. Ms. Goldberg's employer reached out to Defendants and their affiliates about the videos and Defendants removed two videos about Ms. Goldberg and paused their campaign briefly, only to reignite it again. At the time the attacks began, Ms. Goldberg had not interacted with Defendants in several years and her only interaction was warning subscribers to one of Defendants' Telegram channels not to purchase fake identification documents, which Defendants were allowing to be sold via their Telegram Channel. (Defendants blocked Ms. Goldberg from that channel after she issued the warning.)

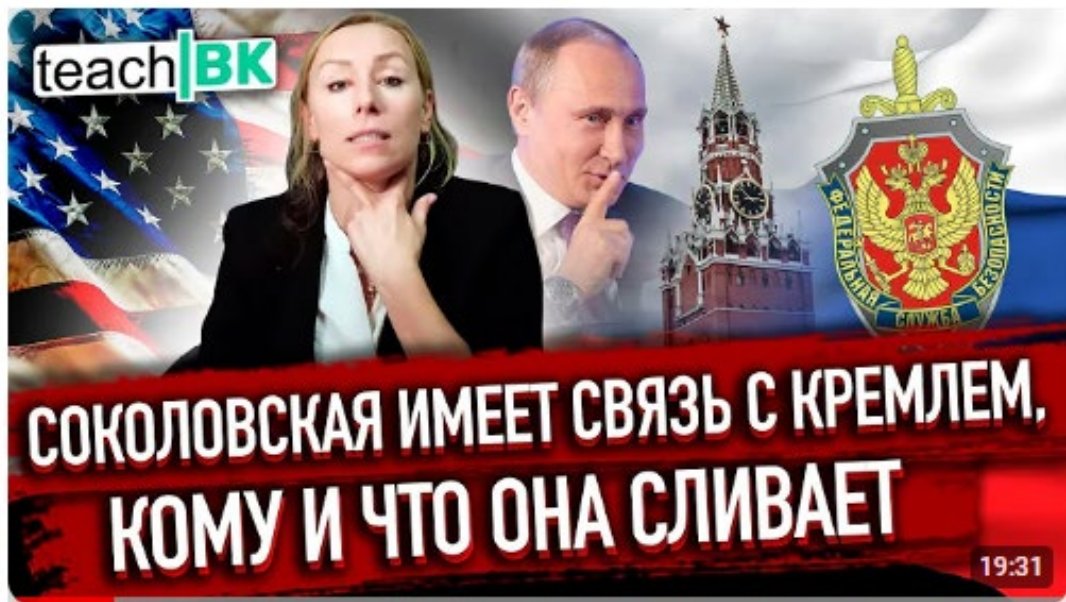
18. Around eight months after the attacks began, and after Kiselev threatened Ms. Goldberg with sexual violence on Facebook, Ms. Goldberg decided she would personally take action. She perused Defendants' social media accounts and learned that Kiselev had claimed he was involved in several legal disputes in Russia. She learned that he was being sued for defamation by a by a former opposition municipal deputy and Aleksey Navalny supporter named Valeriy Katkov.

19. In September 2023, Ms. Goldberg reached out to Katkov to inquire about his litigation against Kiselev in Russia. Somehow Defendants learned that Ms. Goldberg had reached out to Katkov and used that to continue to spin their narrative against her—a private citizen—to further their goals in tarnishing her reputation and thereby drawing viewers and potential clients away from the videos she posted on behalf of her law firm.

20. Specifically, on September 7, 2023, Defendants posted a video on the YouTube Channel titled *Connection between Marina Sokolovskaya from the US and the Russian government. Who does the immigration consultant leak information to?*, which is located at: [https://www.youtube.com/watch?v=ZL\\_CMXcaB90](https://www.youtube.com/watch?v=ZL_CMXcaB90) (the "September Video"). Attached as **Exhibit 1** is a certified English translation of the September Video transcript.

21. The title of the September Video falsely portrays Ms. Goldberg as an agent of the Russian government who leaks information from prospective clients to the Russian Federation government apparatus.

22. The cover photograph for the video drives that message home. It depicts Ms. Goldberg next to Russian President Vladimir Putin with the Kremlin in the background. Putin is holding his index finger to his mouth conveying that Ms. Goldberg is spreading secrets, while Ms. Goldberg is holding her fingers in a v-shape against her neck, a Russian gesture that means “murder”:



23. And the video and accompanying blurbs make the same false accusations.

24. Within the YouTube Channel and on the TeachBK website,<sup>1</sup> Defendants append the following false and defamatory summary to the September Video: “Marina Sokolovskaya leaks personal data to a Russian deputy, who in turn is directly connected with Russia’s security agencies. What case is currently being discussed in Russia, and who knows about it besides Marina and the intelligence services she works with? How ethical is it for Marina, who holds status in the US, to work with the authorities of a

<sup>1</sup> <https://teachbk.com/2023/09/08/svyaz-mariny-sokolovskoj-iz-ssha-s-vlastyu-v-rossii-komu-slivaet-dannye-immigracionnyj-konsultant/>

country she opposes? And how safe is it for those who come to America seeking political asylum? On what terms does Marina Sokolovskaya cooperate with Rubic in the US (Ekaterina Panova, Rubic.us)?” *See* Ex. 1.

25. Within the September Video, Defendants spread myriad falsehoods about Ms. Goldberg. For example, at around 11:40 in the video, Kiselev says:

I am also very surprised by this. How can a person in the United States suddenly have such a quick and close connection with the Russian authorities? And now the following question arises: given that this person runs an immigration channel, calls herself an immigration consultant, previously almost presented herself as a lawyer, takes cases for review, handles case mechanics, communicates with you, takes your contact details, meets people in Cancun, wherever she travels—Mexico City, where their offices are. She meets in New York, meets in the office, sees your faces, knows your contact details. Where do these contact details go later? Where does the essence of the cases you see go, to which Russian authorities? Is it normal for a Russian citizen, being in the United States and working for an American attorney at the Modern Law Group, to receive protection from the American government and then provide personal data to the Russian authorities about people who immigrate to the United States?

26. In response, at around 13:05, Burtsev invents facts about Ms. Goldberg informing on her law firm’s clients to the Kremlin:

In this situation, you know, I think, what kind of conspiracy could there be, what kind of contract conditions could there be, that is, what other immigrants could she be sending there? Maybe it’s all a streamlined situation where they say, Listen, we will help you, but you must provide information about everyone you find and know—people of interest, and maybe even call them by name—when they come to you, let us know, and we’ll see if we are interested in this person or not. Oh, here’s an interesting person! Oh, here’s their case! Here’s their face. When does he come to you? Oh, he has a bad case, right? Tell him his case is bad, and we will deport him. And we are waiting for him here.

27. And Kiselev concludes “And we will meet him, right.”

28. Defendants made these statements and images to scare their viewers and prospective clients of Ms. Goldberg’s firm into believing that Ms. Goldberg was a Russian agent who would have them deported back to Russia where the authorities would be

1 waiting for them to punish them. They used the fact that Ms. Goldberg had reached out  
2 to the man who is suing Kiselev for defamation in Russia to concoct a story that would  
3 tarnish Ms. Goldberg's reputation and scare asylum seekers into using their services and  
4 their attorney referrals instead of hiring Ms. Goldberg's law firm. And they used the  
5 imagery of Putin and the Kremlin in the September Video to drive home this unfounded  
6 conspiracy theory.

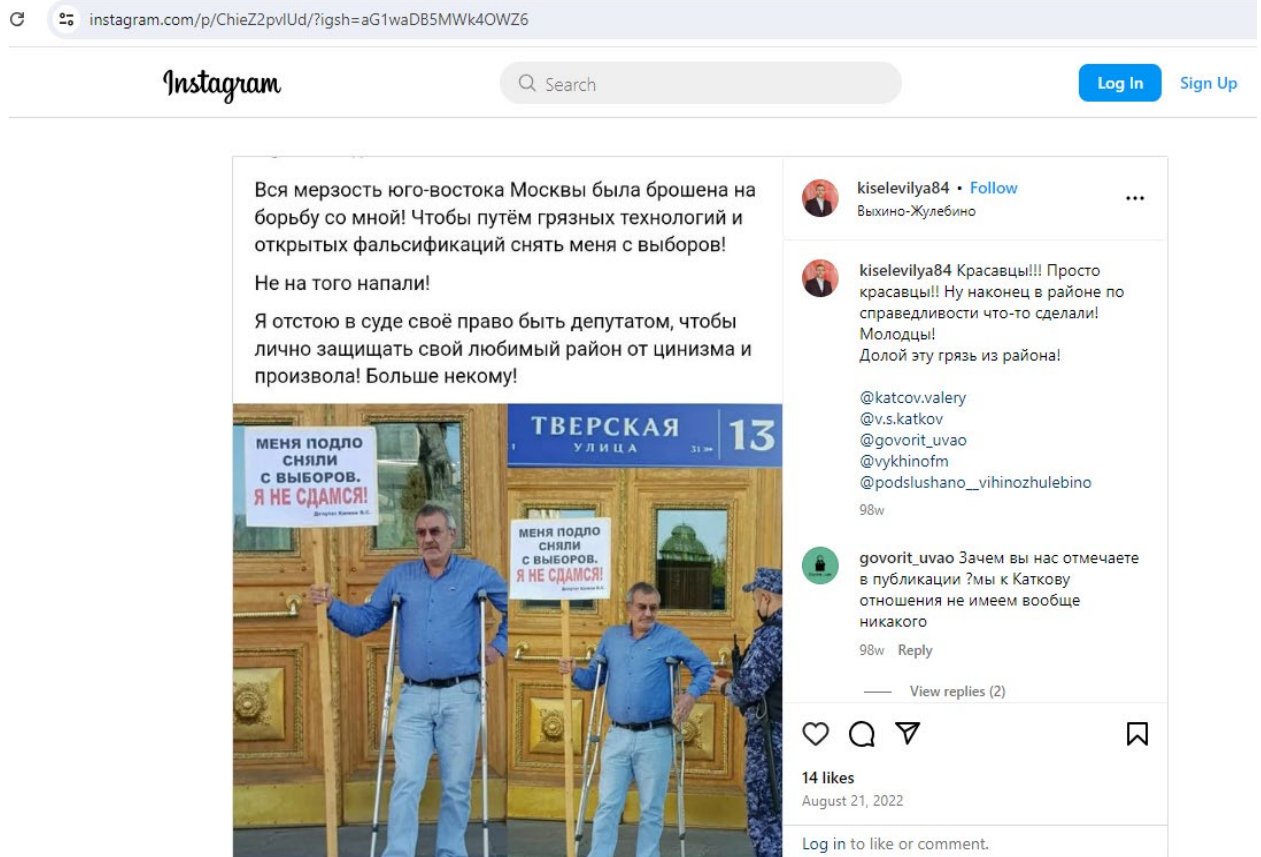
7       29. Kiselev and Burtsev also mischaracterized Ms. Goldberg's September 2023  
8 communications with Katkov as part of a pattern of illicit cooperation with Russian  
9 authorities. Kiselev remarked that this "is not the first time. It means there is some  
10 connection between [Ms. Goldberg] and the current Russian authorities, where there is  
11 a channel through which information goes in both directions. It means that the phone is  
12 answered, listened to, and then hung up. It means the phone is not thrown away when  
13 Sokolovskaya calls from the U.S. to Russia. This is simple logic; no need to speculate."

14       30. He later says, "How she violates all personal data laws, international and  
15 others, leaking all the information to a hostile state of one country or another? Maybe  
16 she is a double agent."

17       31. But Ms. Goldberg never communicated with Katkov before September  
18 2023.

19       32. Further, as Kiselev has admitted elsewhere online, Katkov was a municipal  
20 deputy and independent and had no government role when Ms. Goldberg contacted him.  
21 He wrote to his Instagram followers several times, including in August 2022—a year  
22 before Ms. Goldberg contacted Katkov—that he was glad that Katkov lost his bid to keep  
23 his municipal post, stating "get this filth out of the district," referring to Katkov.

24       33. The picture Kiselev commented on was a screenshot from Katkov where he  
25 wrote that he was "disgracefully taken of the ballots" and that he would not give up  
26 getting his seat back:



34. A certified translation of Kiselev's August 21, 2022 Instagram post is attached as **Exhibit 2**.

35. A week later, in an August 30, 2022 Instagram post, Kiselev wrote about Katkov: "[t]he deputy was thrown out, and he still remembers me and tries to ride on my coattails!! The authorities did the right thing by kicking this scum out of the district, who was just leeching and profiting in a drunken stupor. This criminal should be thrown in the trash, and let a deserving person, of which there are many, take the place!"

38. Kiselev and Burtsev make additional comments in the September Video to the effect that Ms. Goldberg a Kremlin agent, that her law firm's clients and potential clients are at risk, and that they therefore should turn to Defendants and their affiliates instead. Burtsev says:

People who came here for safety risk are not getting that safety. They are at risk because of these assurances from the U.S. that it is the safest country, that you can get protection here, and that you won't be removed if you have grounds for political asylum. Now it turns out that there is a person in the U.S. who collaborates as an infiltrated agent from Russia and transmits this data and also tries to influence the situation in such a way that the people whom the U.S. is protecting now should be deported. Maybe they want to collect some additional data to use it elsewhere for a different purpose.

39. Kiselev and Burtsev conclude the video by asking whether Ms. Goldberg is “the Russian bear in the U.S.” and showing an excerpt from *Seventeen Moments of Spring*, a Soviet television show about a Soviet spy operating in Nazi Germany.

40. To date, the September Video has been viewed by almost 8,000 people.

41. Defendants did not stop their campaign there. They filmed several other videos about Ms. Goldberg and returned to the theme that she was a Russian spy in a video posted on the YouTube Channel and TeachBK website on May 18, 2024, titled *US citizens work with Moscow / The Kremlin is online*, which is located at: [https://www.youtube.com/watch?v=EvnyYIBy\\_o8](https://www.youtube.com/watch?v=EvnyYIBy_o8) (the “May Video”). A certified English translation of the May Video transcript is included in Exhibit 1.

42. The May Video depicts Ms. Goldberg, as well as the owner of a Ukrainian news publication, Kateryna Panova, as Russian spies. The May Video includes a doctored photo depicting them in Russian NKVD uniform with the logo of the Federal Security Service of the Russian Federation (FSB) behind them:



1           43.     The display photograph states that “U.S. citizens are leaking information  
2 about Russians,” meaning that Ms. Goldberg shares confidential information about  
3 Russian asylum seekers with to the Russian government.

4           44.     But Ms. Goldberg is not a Russian spy or agent in any way. Ms. Goldberg  
5 is not affiliated with the Russian government. Ms. Goldberg maintains no contacts with  
6 the Russian government or any of its agents.

7           45.     And Ms. Goldberg has not shared any information about any person to the  
8 Russian government. Doing so would not only be illegal under various federal and state  
9 criminal laws, including 18 U.S.C. § 951, but would also violate state data privacy laws  
10 and the applicable rules of professional conduct involving client and prospective client  
11 confidentiality.

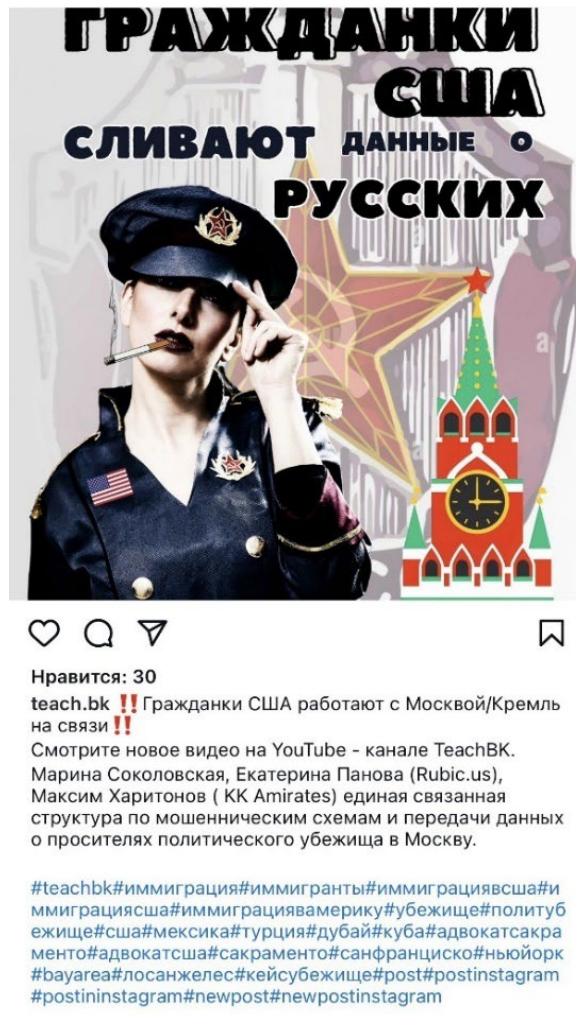
12           46.     Defendants knew Ms. Goldberg was not a spy and was not leaking  
13 information to the Russian government. They knew that she contacted Katkov only  
14 because she was investigating the background of Kiselev, the stranger was attacking her  
15 online.

16           47.     Yet they persisted in their smear campaign to continue to destroy Ms.  
17 Goldberg’s reputation for their own financial benefit.

18           48.     In addition to publishing the May Video, Defendants also disseminated  
19 images on social media promoting the same false claims about Ms. Goldberg. For  
20 example, they posted on the TeachBK Instagram account that Ms. Goldberg was part of  
21 a “unified and connected fraudulent scheme to send the personal information of asylum  
22 seekers to Moscow”:<sup>2</sup>

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23  
24  
25  
26 <sup>2</sup> In a March 15, 2024 video (the “March Video”), Defendants had also invoked this  
27 theme, writing in the video’s summary that Ms. Goldberg along with Ms. Panova and  
28 others were engaged in “major espionage network,” part of an “already established  
criminal structure,” and that the FBI was investigating this “network.” See  
<https://www.youtube.com/watch?v=UoLdHjUqkVo>.



49. The hashtags in the post, on the other hand, bolster Defendants' brand with Russian tags for "asylum," "Mexico," "ImmigrationUSA," "asylum case," "Sacramento attorney," etc.

50. In the blurb for the May Video on their website<sup>3</sup> and on the YouTube Channel, Defendants wrote that "Every time you contact those people [Ms. Goldberg, Ms. Panova, and Mr. Kharitonov], you assume a major risk of having your information transferred back to the place you are fleeing from, and to those who are after you. Respectfully, the TeachBK team."

<sup>3</sup> <https://teachbk.com/2024/05/18/grazhdanki-ssha-rabotayut-s-moskvoj-kreml-na-svyazi/>

1           51. The May Video starts by explaining that Defendants learned that Marina  
2 Sokolovskaya was not Ms. Goldberg’s legal name. They discuss Ms. Goldberg and others  
3 and finally at around 26 minutes into the May Video, Kiselev falsely states: “Marina  
4 Sokolovskaya is clearly connected with deputies from the city of Moscow. We have direct  
5 evidence of this. I personally have direct evidence of this. There are personal  
6 confirmations from Moscow in the form of witness statements—not just some friends,  
7 but witness statements that pertain to law in Moscow and are legal defenders in courts.”

8           52. That is false. To bolster their false claim, Defendants asserted that Ms.  
9 Goldberg’s contact with Katkov—who was suing Kiselev at the time—connects her to the  
10 Russian authorities. They did so by falsely stating that he was a member of a pro-  
11 Kremlin party, when Defendants knew that he was not. And they falsely stated that Ms.  
12 Goldberg was supplying information about her law firm’s clients to Russian authorities:  
13 “ask yourself the question: how do Marina Sokolovskaya and Ms. Ekaterina Panova have  
14 direct access to the country’s leadership in the form of deputies and pro-Russian media  
15 in Moscow?” And: “Why do people who disclose information to Russian deputies in  
16 Moscow also openly show the cases of people who turned to them on their channels?”

17           53. Like the September Video, the May Video also warns viewers that they are  
18 at risk if they contact Ms. Goldberg for immigration assistance because their information  
19 will end up in the Russian government’s hands. Kiselev says: “They clearly understand  
20 what they are doing and how they are doing it. Moreover, we have complete evidence  
21 that Marina Sokolovskaya, who is not Marina Sokolovskaya, and Ekaterina Panova have  
22 a clear connection with Russia today. And they use this connection for communication,  
23 both ways. And before you engage in immigration, before you turn to these wonderful  
24 people, you need to think very carefully about where your information might surface at  
25 any given moment. And what consequences this might have for you.”

26           54. The May Video has been seen by more than 6,000 viewers.

27           55. Shortly after the May Video was published to Defendants’ subscribers and  
28 viewers, Ms. Goldberg posted a message on Facebook in connection with her volunteer

1 efforts to search for missing persons. She posted about a man from Belarus whose family  
2 was searching for him. In response to the post, several individuals posted that they had  
3 “googled” Ms. Goldberg and warned others not to help her because she was a Kremlin  
4 agent—that she was looking for the man to turn him over to Russian authorities. Ms.  
5 Goldberg has also received other comments like these, as well as hate mail and threats.

6 56. The statements and images in the September, March, and May Videos, like  
7 the other statements and images made by Defendants in Exhibit 1 and on the YouTube  
8 Channel, are false and defamatory.

9 57. They are false and defamatory because Ms. Goldberg is not a Russian agent,  
10 not affiliated with the Russian government, and has never transmitted personal  
11 information of clients or prospective clients of her employer’s law firm to the Russian  
12 government.

13 58. Acting as an unregistered foreign agent is a felony under federal law,  
14 specifically 18 U.S.C. § 951, and conspiring to commit an offense against the United  
15 States constitutes a felony under 18 U.S.C. § 371.

16 59. Defendants’ above statements and images accuse Ms. Goldberg of both  
17 these federal crimes, among others. The statements and images also accuse Ms. Goldberg  
18 of dishonesty, poor integrity, a breach of confidence and trust, and acts that violate her  
19 professional obligations and constitute egregious professional misconduct. Such  
20 accusations have brought Ms. Goldberg’s integrity and character into disrepute.

21 60. Ms. Goldberg is not a Russian agent and is not involved in a conspiracy to  
22 commit an offense against the United States. She does not, has not, and would not leak  
23 information to Russian authorities, especially not the information of Russians seeking  
24 asylum in the United States, who could face serious harm if their information and the  
25 basis for their asylum requests were transmitted to the Russian government.

26 61. Therefore, Defendants’ statements that Ms. Goldberg is a Russian agent  
27 and has leaked information about asylum seekers to the Russian government, as well as  
28 the associated imagery, are false.

62. Defendants knew that the statements they made in the March, May and September Videos and in materials published in connection with those videos were false, and they made them with reckless disregard for the truth. They did so in an effort to bolster their clientele through an attack on the reputation of Ms. Goldberg, who was the face of her employer's social media marketing toward Russian asylum seekers.

63. As a result of the statements and videos, which have been viewed by thousands of people, Ms. Goldberg has suffered emotional and reputational harm. The lies have resulted in hate mail and negative comments online, impacts in her ability to volunteer for causes she is associated with, and difficulty in advocating for asylum seekers, many of whom believe that consulting with her about their asylum matter would result in their personal details and persecution histories being relayed to the Russian government they had just escaped.

### **FIRST CLAIM FOR RELIEF**

#### **(Defamation *Per Se* – Against All Defendants)**

Ms. Goldberg incorporates herein by reference each and every allegation contained in paragraphs 1 through 63 above as if fully set forth herein.

64. Defendants published the September, March, and May Videos, and materials on their website and social media in connection with those videos, to third parties.

65. The third parties to whom Defendants published the statements and images were the general public, asylum seekers, and actual and potential customers of Ms. Goldberg's employer.

66. Those third parties reasonably understood that Defendants' statements in the September, March and May Videos, and materials published in connection with those videos, were about Ms. Goldberg.

67. Defendants' statements impute to Ms. Goldberg criminal conduct and those third parties to whom the statements were directed reasonably understood the statements to mean that Ms. Golberg was a foreign spy who leaked client information to

1 the Russian government, which constitutes felony criminal violations, and that the  
2 federal law enforcement was investigating her.

3 68. Those statements also necessarily impute conduct and characteristics  
4 incompatible with Ms. Goldberg's profession as an employee of an immigration law firm,  
5 and as a U.S. citizen, and exposed Ms. Goldberg to hatred, contempt, ridicule, obloquy,  
6 and caused her to be shunned or avoided.

7 69. Defendants' statements and caricatures of Ms. Goldberg were false and  
8 made without justification or privilege.

9 70. Defendants failed to use reasonable care to determine the truth or falsity of  
10 those statements. They also acted intentionally and with malice, oppression, fraud, and  
11 reckless disregard for the truth when they made those statements, knowing that they  
12 were false.

13 71. As a result of Defendants' statements and caricatures, Ms. Goldberg has  
14 suffered harm to her reputation, profession, occupation, as well as shame, mortification,  
15 and emotional distress.

16 72. Accordingly, Ms. Goldberg has suffered damages as a result of Defendants'  
17 statements and caricatures in excess of \$75,000

18 73. As a result of Defendants' statements and caricatures, Ms. Goldberg has  
19 also suffered irreparable injury for which monetary relief is an inadequate remedy and  
20 for which the public interest in favor of an injunction outweighs the potential harm to  
21 Defendants.

## 22 **SECOND CLAIM FOR RELIEF**

### 23 **(Defamation *Per Quod* – Against All Defendants)**

24 Ms. Goldberg incorporates herein by reference each and every allegation  
25 contained in paragraphs 1 through 63 above as if fully set forth herein.

26 74. Defendants published the September, March and May Videos, and  
27 materials on their website and social media in connection with those videos, to third  
28 parties.

1           75. The third parties to whom Defendants published the statements were the  
2 general public, asylum seekers, and actual and potential customers of Ms. Goldberg's  
3 employer.

4           76. Those third parties reasonably understood that Defendants' statements in  
5 the September, March and May Videos, and materials published in connection with those  
6 videos, were about Ms. Goldberg.

7           77. Because of facts and circumstances known to those third parties, the  
8 statements tended to injure Ms. Goldberg in her occupation and exposed her to hatred,  
9 contempt, ridicule and shame, and discouraged others from associating or dealing with  
10 her.

11           78. Defendants' statements were false and made without justification or  
12 privilege.

13           79. Defendants failed to use reasonable care to determine the truth or falsity of  
14 those statements. They also acted with malice, oppression, and fraud when they made  
15 these statements.

16           80. As a result of Defendants' statements, Ms. Goldberg has suffered harm to  
17 her reputation, profession, occupation, as well as shame, mortification, and emotional  
18 distress.

19           81. Specifically, Ms. Goldberg has had clients of her employer terminate their  
20 contracts because of Defendants' statements, had prospective clients to her employer's  
21 firm not engage the law firm because of Defendants' statements, she has received hate  
22 mail, negative comments on social media, and has had her charity work undermined, all  
23 as a result of Defendants' statements.

24           82. Accordingly, Ms. Goldberg has suffered damages as a result of Defendants'  
25 statements and caricatures in excess of \$75,000

26           83. As a result of Defendants' statements and caricatures, Ms. Goldberg has  
27 also suffered irreparable injury for which monetary relief is an inadequate remedy and  
28

1 for which the public interest in favor of an injunction outweighs the potential harm to  
2 Defendants.

3 **PRAYER FOR RELIEF**

4 WHEREFORE, Plaintiff Miriam Goldberg respectfully requests judgment  
5 against Defendants TeachBK, Inc., Ilya Kiselev, and Andrei Burtsev as follows:

6 A. Compensatory damages;

7 B. Punitive damages;

8 C. Retraction;

9 D. Injunctive relief requiring Defendants to remove all defamatory statements  
10 and imagery from any locations where they have been published; and

11 E. Such other, further, and different relief as the Court deems just and proper.

12 Dated: July 26, 2024

13 Respectfully submitted,

14 /s/ Ethan Jacobs

15 Ethan Jacobs (SBN 291838)

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24 *Attorneys for Plaintiff Miriam Goldberg*

**DEMAND FOR JURY TRIAL**

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff Miriam Goldberg hereby demands trial by jury in this action on any issue triable of right by a jury.

Dated: July 26, 2024

Respectfully submitted,

/s/ Ethan Jacobs

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# **Exhibit 1**

# MIKHAIL BOGOMOLNY

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### 1. Connection between Marina Sokolovskaya from the US and the Russian government. Who does the immigration consultant leak information to?

Sep 7, 2023 [#immigration](#) [#America](#) [#Sokolovskaya](#)

Marina Sokolovskaya leaks personal data to a Russian deputy, who in turn is directly connected with Russia's security agencies. What case is currently being discussed in Russia, and who knows about it besides Marina and the intelligence services she works with? How ethical is it for Marina, who holds status in the US, to work with the authorities of a country she opposes? And how safe is it for those who come to America seeking political asylum? On what terms does Marina Sokolovskaya cooperate with Rubik Publishing in the US (Ekaterina Panova, Rubic.us)?

0:25 Burtsev: Greetings, everyone. This is the TeachBK channel, and me, Andrei Burtsev, as well as my friend, a colleague working on this channel, Ilya. Hi there.

0:35 Kiselev: Hi, everyone, TeachBK immigration, immigration TeachBK, well, this has become a tradition; this phrase needs to be said. My name is Ilya Kiselev, and we talk about immigration to the US. Today's episode is a pretty serious one. No more jokes. Previously, we showed people who suffered to some extent from the Modern Law Group and Marina Sokolovskaya, but now we will talk about very serious matters.

1:03 Burtsev: We'll talk about your personal data, the security of your personal data, where it might leak, where it might be transferred, for what purposes, and why. This is the intrigue for the next few minutes.

1:20 Kiselev: But before I tell you what we found and what was brought to us, I want to say at the very beginning: guys, check out our previous releases. We have launched a very cool free service—a map that shows all the information about judges and states—where to go, where not to, and if you are planning immigration to the US for various reasons, you can see which state to go to and where to settle, and which judges you might encounter. For those already in the US, you can check this map for your judges, see how good they are, etc., because this map exclusively reflects information for the Russian-speaking population. Today, it does not include Mexicans, Puerto Ricans, Somalis, and others. We have filtered out all unnecessary information and left it only for the Russian-speaking audience. Therefore, it is the most reliable source today.

2:14 Burtsev: Under this map, if you haven't found your judge or information about your city and state, you can ask a question. More than 70 questions have been asked in the last two days, specifically about judges. We are adding this information, and there was a big update to the map yesterday. Based on your questions, we have partially added information to the map. Go, check, and find the answers to the questions you asked.

2:40 Kiselev: The analytics are completely free. Let's move on to our current topic. The situation is as follows: there is a certain human rights organization in Russia, in Moscow, which at one time defended me personally. What was this defense about? This human rights organization provided defense in court, in Moscow courts, where I was directly litigating against deputies, incumbent deputies of Moscow, and the municipality, and so forth, regarding various opposition views and such. We've had a long history with a huge number of courts over many years, and we've won those cases. This is actually an amazing story. Maybe someday I will tell you about it.

3:44 Burtsev: These deputies are not just from some opposition party. We are talking about opposition on the part of Ilya vis-à-vis a deputy representing the Kremlin, to wit, the United Russia.

3:54 Kiselev: It's not just United Russia; there are communists and many others. These are truly pro-Russian individuals who supported the current government and continue to do so. We had court cases on certain opposition issues, and we won them. Winning an opposition case in Moscow is almost like a miracle. With this human rights organization, we managed to achieve this.

Obviously, we are making various videos about Marina Sokolovskaya, where we provide evidence, including

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interviews with people who have been affected by Marina Sokolovskaya's online publications. These individuals suffered due to her legal activities before and during the trials. These are the people who gave interviews, and this is where the problem lies. We have honestly shown you this problem as it is.

A few days ago, it became clear that Marina Sokolovskaya believes we won't find out about her actions. However, since I have been litigating against the authorities, I have attorneys working in Russia, and I have a very close relationship with them because the legal proceedings are still ongoing, and we are in an active phase of these cases. Recently, I found out that the person we are litigating against, a deputy who owns Russian media outlets that advertise all the actions carried out in Russia, is directly connected to the prosecutor's office, the committee for combating extremism and terrorism, and all the prosecutors in Moscow. This person is extremely close to the government and all the security agencies.

6:17 Burtsev: Essentially, he is the voice of this government in Moscow. If we are talking about the media, it is also broadcast to the people, and what is happening in Russia and beyond Russia, we are talking about Ukraine, etc. All this is broadcast in his newspapers.

6:32 Kiselev: And this person, after another court session, approached my defense and said the following: "I suggest you close the case with Ilya Kiselev because I have irrefutable evidence from the American side that Ilya is violating certain points, and I want to ask you to stop this case because I have a new type of evidence." Naturally, my side told this deputy to go to hell.

7:10 Unknown: Listen, I just left the court. I found out from Katkov that it was Marina Sokolovskaya, your competitor or whoever she is. She sent him there, along with some prosecutors. He is also looking into us, asking questions: Marina said she has relatives dealing with immigration matters, and he latched onto that.

7:47 Kiselev: Everything would be fine if the deputy hadn't named the person currently working with him on my case in Russia. And who could that be? Naturally, it's Marina Sokolovskaya. The most interesting thing is that this deputy couldn't have known about Marina Sokolovskaya's existence. That's one. Secondly, let's compare the dry fact: a US citizen, as Marina Sokolovskaya calls herself in her personal bio on her Facebook pages, says she is against the war in Ukraine, sympathizes with Ukrainian refugees, and calls the Russian government a scum, wishing them all dead, and so forth. She supports Ukraine and is against Russia, yet she contacts the Russian government, asking this government, through its deputy, who is litigating against a Russian citizen in the US, to send certain reports to official US government immigration service websites. She provides direct links and what to write, offering translation services if the person does not know English. This person, who is now involved in an immigration process, reading your cases, offering free review, running a YouTube channel about immigration to the US for political asylum seekers, supporting Ukraine, and publishing all this in the media, namely on Facebook and social networks, as well as YouTube, contacts the current Russian government and asks to write reports to certain websites with a specific storyline, with the active government, which is litigating against the person in the US, meaning me. And she provides certain personal information.

10:15 Burtsev: With the US hands, she is trying to persecute a person who fled their country due to the situation happening there with opposition members. She tries to reach him in the US with Russian hands. What surprises me in this situation is one thing: with all the Russian propaganda about foreign agents, when any contact between officials and citizens of other countries, especially the US, is frowned upon, this is not just some random person but a United Russia deputy, who someone from the US wrote to, and he immediately picked up on this topic, approached the lawyer, and was confident that the lawyer would agree. He was sure that the lawyer would agree. What arguments he used, I don't know, but he expected the lawyer to comply with the demands from a US citizen. My question is: how does a US citizen contact a deputy? How is she connected to him? What events follow? How

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do they cooperate? How can a US citizen cooperate with United Russia, the Kremlin's party? Many questions arise.

11:40 Kiselev:

I am also very surprised by this. How can a person in the United States suddenly have such a quick and close connection with the Russian authorities? And now the following question arises: given that this person runs an immigration channel, calls herself an immigration consultant, previously almost presented herself as a lawyer, takes cases for review, handles case mechanics, communicates with you, takes your contact details, meets people in Cancun, wherever she travels—Mexico City, where their offices are. She meets in New York, meets in the office, sees your faces, knows your contact details. Where do these contact details go later? Where does the essence of the cases you see go, to which Russian authorities? Is it normal for a Russian citizen, being in the United States and working for an American attorney at the Modern Law Group, to receive protection from the American government and then provide personal data to the Russian authorities about people who immigrate to the United States?

13:05 Burtsev: In this situation, you know, I think, what kind of conspiracy could there be, what kind of contract conditions could there be, that is, what other immigrants could she be sending there? Maybe it's all a streamlined situation where they say, Listen, we will help you, but you must provide information about everyone you find and know—people of interest, and maybe even call them by name—when they come to you, let us know, and we'll see if we are interested in this person or not. Oh, here's an interesting person! Oh, here's their case! Here's their face. When does he come to you? Oh, he has a bad case, right? Tell him his case is bad, and we will deport him. And we are waiting for him here.

13:41 Kiselev: And we will meet him, right.

13:43 Burtsev: Yes, they will be waiting for you there. Remember that your personal data must be protected. And remember that the people you work with must be reliable, professionals in their field. Not just someone from YouTube, but a lawyer who you initially build a relationship with: you see him, you greet him, you contract with him, and he signs it in your presence. You are sure that this person will protect you and not leak your data to an unknown side or to your country?

14:17 Kiselev: And you know what else interests me? A deputy approached the defense and started talking to lawyers, deeming this to be acceptable. So it could be said that Marina Sokolovskaya randomly contacted them and suddenly got a response. I can hardly imagine that. Anyone living in Russia understands how difficult it is to get any response from the authorities. And here, a Russian citizen approached a deputy, and he wasn't afraid, interacting with a U.S. citizen, given the latest events in the foreign policy game, to approach lawyers and start blackmailing, saying I am communicating with U.S. citizens, and we have this kind of information. This suggests that the person knows who contacted her, knows how they work and under what conditions, and was not afraid of any persecution as a deputy, which means it is not the first time. It means there is some connection between Marina Sokolovskaya and the current Russian authorities, where there is a channel through which information goes in both directions. It means that the phone is answered, listened to, and then hung up. It means the phone is not thrown away when Sokolovskaya calls from the U.S. to Russia. This is simple logic; no need to speculate. I was just very interested to hear the name and last name of Marina Sokolovskaya in the Moscow City Court on September 7, 2023. And now I have a huge request. Naturally, we will contact law enforcement, etc., and I have

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a huge request to the FBI, CIA, foreign intelligence, and domestic intelligence of both countries to pay attention to this lady. How she violates all personal data laws, international and others, leaking all the information to a hostile state of one country or another? Maybe she is a double agent.

16:33 Burtsev: People who came here for safety risk are not getting that safety. They are at risk because of these assurances from the U.S. that it is the safest country, that you can get protection here, and that you won't be removed if you have grounds for political asylum. Now it turns out that there is a person in the U.S. who collaborates as an infiltrated agent from Russia and transmits this data and also tries to influence the situation in such a way that the people whom the U.S. is protecting now should be deported. Maybe they want to collect some additional data to use it elsewhere for a different purpose.

17:21 Kiselev: And the phrase that was thrown at the end of one of the videos on Marina Sokolovskaya's channel, where she was trying to justify herself with a lawyer in response to all our videos, about the thugs and so on, has taken on new meaning.

17:38 Video from the Modern Law Group channel: I think there is what Russians say. It says that you can only... We have been poked so many times... [sic]

17:50 Kiselev: Like, don't poke the bear; you can poke the bear for a long time, and then when you've poked it enough, it will wake up. So, this is a purely Russian saying. And I could never understand why this Russian adage is heard here, in the U.S.: the Russian bear, well, it seems, poke it, and it will wake up... And now the question arises: is Marina Sokolovskaya the Russian bear in the U.S.?

18:19 Burtsev: You need to think and, once again, consider whether we are calling the right person Sokolovskaya. Is she really Sokolovskaya? A lot of interesting things are ahead.

18:33 Kiselev: Yes, is she Sokolovskaya?

18:35: Don't go anywhere and subscribe to our channel.

18:36 Kiselev: Things will get very interesting moving forward, and on that note, we send huge greetings to Marina. I think we will definitely meet, but in a different setting and to have a different kind of conversation. Thank you.

18:40 Excerpt from the movie "Seventeen Moments of Spring" And this will help us too. It was his cipher sent with Pleyshner to Bern. But here is the failure. This is a collapse.

### **2. US citizens work with Moscow / The Kremlin is online.**

**May 18, 2024 [#USImmigration](#) [#America](#)**

**Marina Sokolovskaya, Ekaterina Panova (Rubic.us), Maksim Kharitonov (KK Amirates)—a unified, interconnected group of scammers aimed at leaking information on the political asylum seekers back to Moscow. Every time you contact those people, you assume a major risk of having your information transferred back to the place you are fleeing from, and to those who are after you. Respectfully, the TeachBK team.**

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00:26 Burtsev: Hi, all. TeachBK channel here, my name is Andrei Burtsev. And with me here is my friend and a colleague, Ilya. Hi, Ilya.

00:30 Kiselev: Hello, hello. Here's Ilya, TeachBK immigration. And here we will record the last video today—at least I think so—the final video about our dear, wonderful friends with whom we have been at odds for many years. We need to summarize a bit. What we came to and what we found, what we learned. And we have learned many interesting things, which we will actually talk about in today's video. And probably the next one. If we do make one about these people, it will be as events develop and as things happen, and a lot of interesting things will definitely happen in the future. But we won't jump ahead of ourselves and won't reveal all the cards that probably shouldn't be revealed now.

1:24 Burtsev: With this video, we want to recap the past few months. Not everything is quiet and peaceful while someone keeps quiet. And when events start to unfold, it will be known not only on our channel, but it will also be known on other channels too.

1:43 Kiselev: Yes, indeed, it will be known to many. And I think it will be quite interesting. In recent months, we deliberately didn't record any videos about these people because there was a lot going on in our lives and our work, etc. And so, we kept the information we had. And now we will probably start to gradually lift the veil of secrecy—what we found, what we were doing, and, in fact, what we learned. And we learned the following: let's probably start with the first person... I'll jump ahead right away and say that this is a very complex scheme; we've been unraveling it for a very long time; we collected information bit by bit, connected the dots, and so forth. We succeeded. But the scheme is very serious; it turned into a whole series. The first individual worth talking about is the face of the 'branch of evil' that exists in the United States and who runs this whole thing. That is Marina Sokolovskaya.

2:57 Marina Sokolovskaya: Friends, hello everyone, you are on the channel dedicated to political asylum in the US. My name is Marina Sokolovskaya, and today's subject is extremely important, as it always is...

3:04 Kiselev: Marina Sokolovskaya—is she Marina Sokolovskaya?

3:10 Burtsev: In fact, we have already released a video on this subject. Gathering information, the deeper you dig, the more different interesting ideas you find; many different interesting facts, which we share little by little and see how the person starts to get nervous, how the person starts to write something about it somewhere, to the extent that 'I am no longer Marina Sokolovskaya.'

3:36 Kiselev: Yes, here is what's surprising: recalling the very beginning, when we were just starting to sort out this whole mess, we started saying, "You know, Marina Sokolovskaya is not Marina Sokolovskaya," and in general, Marina Sokolovskaya may not exist in the United States. And then Marina Sokolovskaya began to say on her Facebook and everywhere else, "What do these thugs know? How will they prove it? What is this? How can this be! What business is it of theirs?" Then gradually, Marina Sokolovskaya started making Facebook posts, where she began to slowly, carefully throw out fishing lines with excuses, saying "well, yes," "well, what if I'm not Marina Sokolovskaya," "and not Marina, and not Sokolovskaya." Well, maybe this is my pseudonym, so what? Or maybe not a pseudonym. Or maybe a pseudonym. And then suddenly still a pseudonym.

4:36 Burtsev: That's a manner of communication: today I am a lawyer, or maybe I am not a lawyer. Maybe I am a journalist, or maybe I am still a lawyer, and give me your information; I will disseminate it all over the Internet.

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Or maybe I am also a lawyer who will leak all the information somewhere in Russia. This is what we want to talk about today because today's subject of our broadcast is more for our viewers who watch to understand who they trust, who they provide their information to, if they have already done so. And how this can turn out for them.

5:11 Kiselev: Continuing the conversation, we found out that Marina Sokolovskaya is not Marina Sokolovskaya. And of course, in our previous broadcasts, if you watch those about her, we haven't been saying this out in the open because we left some room for intrigue. Now we are stating very clearly that Marina Sokolovskaya is not Marina Sokolovskaya and has nothing to do with Marina Sokolovskaya. The person with the face of Marina Sokolovskaya is not Marina Sokolovskaya.

5:38: Burtsev: 'Also known as Zhora...'

5:42 Kiselev: Also known as Goldberg, also as Marianna probably, and some other last names are attached to this person. It is still unclear who Marina Sokolovskaya is because there are several faces belonging to this individual. Essentially, no one knows who Marina Sokolovskaya is, except for Marina Sokolovskaya herself, and even that is unclear. But that's not our concern. It's the concern of completely different people who are involved in completely different matters. This lady let's call her "madam," because calling her Marina Sokolovskaya is pointless; moreover, we don't understand to whom we are referring. What she does: she runs a YouTube channel, which is now slowly dying. Yet she has already started a new YouTube channel dedicated to investors's visas. They are getting involved in everything. And this madam under the alias Marina Sokolovskaya suddenly considered herself a lawyer at some point. And she strenuously made it appear everywhere (and there is no ambiguity to that) where she openly said, "You know, people come to me and say, Marina, how many cases have you won last year? And I answer them..." And she has videos where she responds:

7:13 Sokolovskaya: Very often you ask a question that has no answer; you say, "Show me, Marina, your statistics of won cases." And do you know what statistics you're referring to? For example, how many LGBT-related court cases have you won? And I never tire of repeating that such statistics do not exist. Victory statistics in general are a very delicate thing. We did not lose a single case last year.

7:31 Kiselev: And here's what's most interesting: Marina Sokolovskaya has never been a lawyer. She has absolutely no connection to law. Neither in the form of Russian education nor Ukrainian education, nor any other education at all. She is an ordinary journalist who essentially dealt with mediocre work—wrote mediocre articles somewhere in Russia. And later engaged in the search for missing people in the US. She never had any connection to immigration. At all. Yes, this person spent a significant time engaged in journalism, some pseudo-investigations, etc. Then she rushed to the US, and to somehow make a living and figure out where to get money, she suddenly got into immigration. At some point, she came to our Telegram chat 'TeachBK' when it was just starting and tried to conduct some consultations there, etc. We quickly kicked her out for the simple reason that she was talking nonsense, uttering rubbish. And she was doing it from the position of an expert, saying, "I am such an expert, and I will tell you everything now." We quickly put a stop to it. We said, "No, in our chat this can only be done by licensed attorneys, or us, who at least are responsible for ourselves." I, Ilya Kiselev, do not have a pseudonym. And Andrei Burtsev, who also does not have a pseudonym.

8:53 Burtsev: I will pinch in here and say: Now surely those who are watching (haters included, who I hope will watch this video and post their angry comments) will say, "But you also did not engage in immigration; why are you talking about immigration?" And we will tell you that "we, unlike some people who talk about immigration on their channels, invite experts: licensed immigration attorneys in the US. And the opinion we receive, the information we receive, is received directly from them. They speak for themselves; they introduce themselves

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and talk on our channel." Unlike other channels, where some lawyer, who supposedly speaks Russian, came out, said "hello, people," and again switched back to English. And supposedly he speaks Russian. It's unclear whether he speaks Russian or not; we never heard that he did.

9:40 Kiselev: Moreover, how did this person, the owner of the company Modern Law Group, Malcolm, or whatever his last name is, appear on the channel? He wasn't on Marina Sokolovskaya's channel. The thing is that we pressured them: because Marina Sokolovskaya individually (that is, not Marina, but madam)—that "someone" ran this channel individually, talked about immigration, answered questions, and did a lot of things. And when once we pressured her, saying that Marina Sokolovskaya is not a lawyer, and stated in our videos that she is not a lawyer and has no connection to law, and she is nobody in immigration law, she then realized that it started smelling like trouble and ran to her lawyer. She told him, "Well, listen, some lawyers should at least appear on our channel." And after that, this Malcolm guy, who naturally does not know Russian, showed up. According to a memorized script, he said three words in Russian, and that's all. And as Andrei mentioned, switched back to English. And after we pressured them, they began to slowly pull out their lawyers, presenting some guy out there. They began to show their lawyers because, by that time... well, that was way out of line at that point. And then interesting plots began to unfold. Why did we even on her case? It would seem there are so many scammers on the market. But the thing is that Marina Sokolovskaya, when we found out that she is not Marina Sokolovskaya, confused us at first. The second thing that confused us was that she started posting cases on her YouTube channel. The cases belonged to people who contacted them. These people came to us and said, "Uh-oh! What is this?" Complaints were submitted to the bar association. We downloaded these videos; of course, we have them because after we stated in our videos that Marina Sokolovskaya leaks cases on YouTube, she immediately went ahead and deleted these videos from her channel.

11:40 Sokolovskaya: Hello everyone, hello everyone. Today is a very important topic: we are starting a large series of broadcasts or videos, whatever you want to call them, in which we will review cases. Specific cases that you sent us. Remember that you can always send a case; we will review it, tell you about its strengths and weaknesses, and say whether it is viable, which is very important. And I recommend everyone to do this before you get to the border: it is important to understand what you are going there with, why you are going, and how viable what you are carrying in your head and in the form of documents is. To reiterate [I mean to say]—for the court. Today we start reviewing cases. These cases, which we will review today, were sent to us. We have a special bot on Telegram; it is anonymous; your cases are sent there; no one sees them except us, except me, actually. If you want your case to be evaluated, please send it to me personally. Here on the side, here is where the link always appears, a QR code that can be scanned and lead to my channel.

12:38 Kiselev: Meanwhile, she claimed that she was doing everything legally. We have saved all these videos, and each time she later claims that she didn't do it. No. She did. And those videos existed, and a large number of people watched them. She completely discredited the cases of real people that she published, which is absolutely terrible. But why would she do this? There is an explanation for that too.

13:06 Burtsev: Here I want to add another important thing: when we collect information, we certainly have things to do. We accumulate a large amount of information on our channel and share it, but since we interact with our audience, our audience interacts with us. And we occasionally receive information such as "I have this problem" or "I have that problem." And it's clear that there are problems when people come from their countries with problems they had there. But the issue arises when the problem occurs in the United States, and it involves people who seemingly could have been helped, but it turned out the opposite. They ask for help because when they sought help, they were deceived—some were not taken to court, others were not refunded their money, etc. And

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they naturally ask for publicity. We can share on our channel, using the example of the specific person who approached us, so that others who follow in their footsteps don't make the same mistakes. Therefore, as the ideology of our channel, we always try to warn people of dangers. We share this information on our channel, always using real-life examples and documents they send us. We don't just say, "These people are bad and do this and that." We always have facts if you look at our channel.

14:25 Kiselev: Starting all these investigations, we published everything in our videos based on documentary evidence. We showed contracts, signatures, who signed them, with whom the contracts were made, and so on. At the same time, from Marina Sokolovskaya, there was nothing but rudeness. She tried to oppose us somehow, but aside from calling us "shiteaters" and "thugs"—the classics—we heard nothing more in our address. No specifics, no accusations came our way. But Marina Sokolovskaya went further: she understood that she couldn't openly say anything against us, so she published her pitiful posts, calling us "shit-eaters" and "thugs," but not mentioning our names or the name of our channel. Although we are not people who have any double names or pseudonyms.

15:25 Burtsev: I know one person who didn't like to call his enemies by name. He lives in Russia and is from St. Petersburg.

15:36 Kiselev: We started publishing everything, and what did Marina Sokolovskaya do? The first thing she did was realize that she couldn't fight us directly. She ran to other people and quickly started making false posts, writing false articles. The first ones she ran to were, of course, "Rubic." And there was Ekaterina Panova. She generally doesn't care what she prints or says. She happily published an article about us that had no relation to reality. And since we are prominent people in Russian immigration, all the people we had interfered with immediately ran to her. We understood this perfectly well. And everyone eagerly started promoting these articles; Rubic happily started publishing all of it. Sokolovskaya also quickly began publishing all this in her "Vinograd." And everyone began publishing everything against us, but again, there was no specificity. There were attempts to twist facts and distort what actually happened, but without any evidence.

16:50 Burtsev: I actually like it when facts are distorted, when things are taken out of context. When some messages are cut out of context just from "the middle of a word": and "look, they said this!" So, no one ever posted the full message or the full conversation. Even when they posted screenshots in their videos, where your or my message was, and at the same time, they were saying some text in the background, people who can think for themselves paused and looked, "What's in that message written by Andrei or Ilya?" And they asked questions: "What nonsense are you talking about in your video, saying something completely different from what was written in this message you are showing us in the screenshot?"

17:29 Kiselev: It got ridiculous: they said one thing in the video, and the screenshot showed something completely different. An inattentive person wouldn't notice this. But someone meticulous would definitely pay attention—what documents, what papers Panova and Sokolovskaya show in their videos. So it came to the point that Tavaryan naturally started suing Ekaterina for defamation. At the same time, Ekaterina Panova started running around the media, telling acquaintances and friends that she was suing the lawyer. But this is very funny.

18:09 Burtsev: She says she's suing him, and then she says that Tavaryan is suing her and he's already losing. So who is suing whom? And who is losing in this story? You need to define a line of your narrative so that the beginning and end of the information match.

18:25 Kiselev: And what's most interesting, Ekaterina Panova and Marina Sokolovskaya are two friends who

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decided to "be friends against a common enemy." And they both launched a campaign against us. Besides, Marina Sokolovskaya ran to the police, somewhere else, and wrote that she was being sexually harassed, that our followers were stalking her, threatening her, and so on, and suddenly we were blamed for this. I don't know if this is true or not. But she can't directly accuse us of anything, so she ran around with this scheme and complained about us. Obviously, these complaints went nowhere because the police looked, laughed, and went about their business. Ms. Panova began spreading her pseudoscientific articles about us everywhere. And who appeared on the horizon to confirm these articles? You'll never guess—Maksim Kharitonov! The same person we also made a video about, the handsome guy from Great Britain who sold and sells access through Nuevo-Progreso, which is completely free. As soon as we found out that Maksim Kharitonov was selling access through Nuevo-Progreso, we made a video saying it was free, which completely killed his business, and he was very upset. And he hastened to provide a pseudo-recording proving something to Ms. Panova: Look, I have a recording of Kiselev saying something. But he took this recording out of context, not understanding where it came from. But Panova doesn't really get it, and she just spread it everywhere, not understanding that it was about Great Britain, not the US, but that's a completely different story, and no one is interested in it. So, we uncovered the following: Marina Sokolovskaya is not Marina Sokolovskaya who came to the US and has at least three different names and last names belonging to this person. That's the first thing. Second, Marina Sokolovskaya is a close friend of Ms. Ekaterina Panova, who is now being sued by Tavaryan for defamation and who, in turn, published various news articles that have nothing to do with us at all and for which she will naturally suffer greatly. She is now trying in every way to say that she is winning, that she is suing someone... she has a flight of fantasy.

21:12 Burstev: Regarding the claims of winning and litigating: when the lawsuit against Panova came up, it turned out she had moved, so the case needed to be heard in a different jurisdiction. The case had to be transferred from one state to another, which was a formal matter. Panova's PR campaign blew it out of proportion, claiming that the lawyer was losing, that he couldn't do anything anymore, that he was giving up, and that they had defeated him. In reality, he wasn't giving up; he was simply transferring the case to another state, as required by U.S. law.

21:47 Kiselev: And then Maksim Kharitonov joined them, writing laudatory reviews and comments on Facebook, on the posts and YouTube channels of Panova and Sokolovskaya, and it became clear that they were connected. Then Maksim Kharitonov approached us with the words, "Oh my, you're making videos about me, calling me a scoundrel; I'll report you to the police and the FBI." And he wrote exactly the same text that Marina Sokolovsky had written before. This shows that Marina Sokolovskaya was advising Maksim Kharitonov on how to act against Ilya and Andrei. Obviously, neither of them succeeded in anything.

22:30 Burtsev: She, I believe, talked about harassment, threats, bullying, and other nonsense, which spread everywhere, following the same pattern from her, Kharitonov, and someone else.

22:45 Kiselev: Kharitonov did the same thing, saying, "Your followers are threatening me because of your videos. I will sue you; blah, blah, blah, you are threatening me, my health and life, etc."

22:58 Burtsev: This is similar to what Marina Sokolovskaya said. She said that people came to her office, so now she is afraid to go out. Maybe these were also our followers who, after arriving in the US, decided, "Let's go to Great Britain and find Maksim Kharitonov and threaten him too." And they traveled from the US in such a brave big group to Great Britain and started threatening him. Our followers are just omnipotent.

23:21 Kiselev: We're the mafia. The international mafia. But that's not the most interesting part. The most

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interesting part is that they are all connected: Marina Sokolovskaya, Maksim Kharitonov, and, of course, Ms. Ekaterina Panova. But it's clear that Panova has some psychological issues. And Marina Sokolovskaya and Kharitonov are two active units trying to deceive people as much as possible. And, of course, pass the information where needed. Kharitonov was selling access through the border at Nuevo-Progreso; we shut it down, and he needed something to do. What is he doing now? He started selling expert opinions; he became an expert; he's being nominated for awards in Great Britain.

24:11 Kharitonov: I was nominated for the "Best Expert Witness 2024" award this year.

24:19 Kiselev: They sent me something funny. Look, Maksim Kharitonov has become an expert. I thought, "Let me see." A person in Great Britain has also become an expert! We need to congratulate him: Maksim Kharitonov, we congratulate you from here. Since when has a person without a legal education, who has never dealt with immigration but was involved in financial pyramids in Russia, deceiving pensioners, suddenly become an immigration expert—is a big question for me. Another question is why he suddenly became an expert on all countries, including the CIS and Russia. But then I decided to see "who recognized him as an expert." And it was a charitable organization that exists on the contributions of its members. Everyone is included there. You pay, and they make you an expert. It all makes sense. And Mr. Kharitonov, having entered such an organization, quickly signed up, wrote a profile about himself, and became what? That's right, an expert. Now he sells these papers to confirm and strengthen your case. A scheme for suckers who can't even read.

25:31 Burtsev: In this situation, the focus is on the CIS countries—why does this person think that citizens from the CIS are so stupid that they wouldn't understand such a blatant scam? Does this person really think that citizens from the CIS are that dumb? I apologize. Why is there such disrespect towards these countries? "I am an expert on CIS countries"—just how disrespectful do you have to be to your audience to treat them like this?

26:00 Kiselev: And this person gives testimony to that very same Ekaterina Panova, who owns "Rubic". So, here's the picture that emerges: Marina Sokolovskaya, Maksim Kharitonov, and Ekaterina Panova are a group trying to exploit the market and turn it into a cash cow, and unfortunately, many people suffer from it. They come to us, and we try to gather them, figure something out with them, and so on. But that's not the most interesting part. The trail leads to another country. And now we know for sure, I declare to you directly—Ms. Sokolovskaya, you can go to court with this and complain somewhere else; I don't know where—but I state this openly on the internet. Openly calling Marina Sokolovskaya, not Marina Sokolovskaya; I don't know what to call her properly; we'll call her as known on the internet: Marina Sokolovskaya is clearly connected with deputies from the city of Moscow. We have direct evidence of this. I personally have direct evidence of this. There are personal confirmations from Moscow in the form of witness statements—not just some friends, but witness statements that pertain to law in Moscow and are legal defenders in courts.

27:25 Burtsev: These are the ones who people tried to bribe; the ones Sokolovskaya turned to.

27:30 Kiselev: It wasn't even a bribe. It wasn't just a bribe; there was a threat involved. And the name Marina Sokolovskaya came up not somewhere in America but in the Kuzminsky City Court of Moscow, where a deputy of Moscow is suing an individual. And she appeared during the court session. There is correspondence where Marina Sokolovskaya clearly suddenly appears; she has a direct connection with a deputy from Moscow, where she says, "You shouldn't defend this person in court; you need to write certain material in the US to somehow obstruct this person, discredit him, etc." Thus, she leaks personal data of a certain person to Moscow. And here arises the question: how does a US citizen named Marina Sokolovskaya, who is not Marina Sokolovskaya

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(whether she is a US citizen is also unknown), but she claims to be a US citizen everywhere, how do her details appear in the Moscow Kuzminsky Court? Very interesting, isn't it? But we have clear evidence that this happened exactly as described. We have written evidence, including a screenshot of the correspondence. How did this happen? And the deputy in Moscow is not only a former deputy but also the owner of media outlets that belong to him personally and are completely pro-Russian. And in these media outlets, he confirms that Marina Sokolovskaya approached him.

29:26 Burtsev: And another thing. You might say, "a deputy from some unknown party." A deputy from "United Russia," actually.

29:33 Kiselev: Well, he's not only from "United Russia," he has also been with the Communist Party of the Russian Federation; he's been everywhere. The question is not even about that. The question is how Marina Sokolovskaya, a US citizen, has such a close connection with the Kuzminsky Court in Moscow. Despite the fact that in her social networks she is clearly not a pro-Russian person. She is a person who severely criticizes Russia, calling it "Rashka," calling everyone "Russcists," "kill them all, shoot them all; I hate them, scum!" These are the posts on social networks that belong to Marina Sokolovskaya; these are her posts: "kill everyone, I hate everyone," "damned Moska," "kill everyone, just fucking shoot them all." But at the same time, she has a direct connection with a deputy from Moscow. Connections with "Rubic" connections with Kharitonov from Great Britain, they are all involved in some shady business, selling something to someone, to poor immigrants, while using pseudonyms, and not even their real names.

30:51 Burtsev: The most interesting thing is —when we started pressing on this "furuncle," let's call it that, at that moment, an article from "Rubic" spread across Russian-speaking media and unclear websites by means of "copy-paste." How do media usually write web articles? They echo the article somehow, each presenting it in their own way. Not here! They just took her article, copied it, and it spread across various identical websites, which began reposting it through some local media.

31:23 Kiselev: The most interesting thing is: where does "Rubic" get such connections with Russian and pro-Russian media, which, at the same time, on the same day, disseminate information about people living in the US by the thousands in Russian media? How do they have such capabilities, given that everything is now under strict censorship and many articles just don't get through? They just don't get through. But "Rubic" and Ms. Marina Sokolovskaya have these capabilities. And every time something about us is made, whenever they try to make something, again Marina Sokolovskaya and her pseudo-channels never provide any evidence at all. We always show everything as it is. That is, during the broadcast, you see screenshots, pictures, photos, last names, and names. This shows that we are confident in what we are talking about. And we are not afraid to name people by their names and are completely ready to address these people and testify against them, which they cannot do against us. So, the question is, why? But back to the main point: everyone watching this video, ask yourself the question: how do Marina Sokolovskaya and Ms. Ekaterina Panova have direct access to the country's leadership in the form of deputies and pro-Russian media in Moscow? If you can answer this question, or Ms. Sokolovskaya might be able to answer this question, we would be very happy to get a response.

33:05 Burtsev: Why do people who disclose information to Russian deputies in Moscow also openly show the cases of people who turned to them on their channels?

33:18 Kiselev: And after that, on their Facebook and their channels, they say, "Guys, please contact us; tell us your cases; it's completely free."

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33:27 Sokolovskaya: In our group, we always have our anonymous chat in Telegram, where you can send your case, but please provide your details so I can contact you and tell you what I think about it. Again, for the third time, I repeat—whether it is viable or not, whether it can form the basis of a case, if there are the necessary episodes, details, what evidence you might need to get, and so on. I usually respond very thoroughly to your requests when it comes to cases."

33:54 Kiselev: We will tell you if you qualify for [asylum] or not, and we will analyze your case. Ask yourself, "Where will this case appear next time, somewhere in the country you left?" This is a big, big question. In summary, and to avoid making this video too lengthy, we want to say the following: everyone who watches TeachBK—there are clearly two different camps among them—those who love TeachBK and understand what it's about, and those who hate TeachBK, falling under the influence of other platforms, etc. Believe me: over the past 3-4 years, we have come to understand perfectly well how the immigration market is structured; we know very well who does what. Our project was originally built on honesty, decency, etc. To date, there is not a single person who could documentably accuse us of anything, despite the attempts of some people who are currently doing what they are doing. Unfortunately, or fortunately, that's the case. We have always kept our standards and our honor clean and fiercely defended our name, TeachBK, etc. From the very beginning, we never operated under pseudonyms and never hid from anyone, showing our faces. Which cannot be said about 80% of all those Telegram channels, chats, etc., that deal with immigration. No one knows who is behind them; rather, we know, but most people, 90% of them, do not know who is behind them, where they live, and whether they have ever dealt with immigration at all. We can only say one thing: that 98% of all those Telegram chats that currently exist and deal with immigration are fully curated from Russia. All admins who live in Russia try to tell you how to immigrate to the US and how to do it correctly. 98%. Almost all well-known YouTube channels are all operated from Russia. And all these people live in Russia. These people have nothing to do with America. As for Marina Sokolovskaya, Maksim Kharitonov, and all these wonderful friends, these guys are engaged in specific criminal activities. They clearly understand what they are doing and how they are doing it. Moreover, we have complete evidence that Marina Sokolovskaya, who is not Marina Sokolovskaya, and Ekaterina Panova have a clear connection with Russia today. And they use this connection for communication, both ways. And before you engage in immigration, before you turn to these wonderful people, you need to think very carefully about where your information might surface at any given moment. And what consequences this might have for you.

37:02 Burtsev: I'll add something from myself: we are, of course, not the final authority broadcasting on the internet. You, as viewers of our channel, watch many other channels. And naturally, as thinking individuals, you can accumulate information and draw your own conclusions. This information is not meant for you to blindly believe it. You can look at the evidence provided, listen again to what we said, and compare it with the information you receive from other sources. Explain, find intersections, and simply understand how it all works, and apply basic critical thinking to at least make your own conclusions, your own decisions. Also, it's worth mentioning at the end of this slightly extended episode that there are already people who have some trust in the field of immigration but are starting to engage in shady schemes of writing and selling cases. This I also don't understand.

38:02 Kiselev: These people are essentially signing their own "death warrant," so to speak. We all understand everyone needs to survive, and many, like our channel, live off advertising. But guys! You can't advertise what shouldn't be advertised. You are crossing all boundaries of what is allowed and not allowed. Previously, we were neutral towards these people and even sometimes advised, saying, "You know, an interesting story was released on that channel; why don't you watch it?" when we were asked. But now we look at these channels, and they openly say, "Buy a case." We advertise a company that writes cases, and here's a promo code for a discount."

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Guys, this is a lie. The immigration market is turning into a dump. This is very bad. This must not be allowed.

38:59 Burtsev: And then people wonder why the US detains people from Russian-speaking countries, subjects them to numerous checks, why they are not trusted, not trusted with the documents they provide. Because the situation is now flooded with a large number of such fake documents and fake stories, written in the same template by the same company and the same group of people. Naturally, people start looking at Russian-speaking individuals through a certain prism. Now everyone needs to be double-checked, because there is a very high risk that this person is applying without grounds, having turned to such companies advertised with a promo code.

39:42 Kiselev: And probably a piece of advice for the future for those who are starting to look towards immigration and have political cases or persecution—guys, go directly to licensed attorneys; you won't regret it. Even now, people who come to us, we refer them directly and completely free of charge to licensed attorneys and say, "Go! here's a direct contact info. Talk, negotiate, communicate directly." We are not even intermediaries between these attorneys; we are just like a transport: here's the attorney; go there and communicate. Talk to licensed specialists and attorneys for anything related to law and cases. Don't talk with just anyone. And especially if you don't know their name, last name, and, in general, who this person is. And what will happen to your information? The next video will probably be about Marina Sokolovskaya and all her company; we will definitely record it, but I think it will be after a long period because we will gather material, we are working with this material, and as the development progresses, which has already started, we will give you some feedback on what is happening to date. Of course, we can't tell you everything, but what we can, we will show you.

41:08 Burtsev: Taking this moment, thank you to everyone who wrote to us in support of the information that was previously published, sharing your information and your problems that you encountered when dealing with these people. Again, sharing materials and documents with us. Thank you very much for helping us to break down this chain a bit and make everything more transparent and understandable. And this includes not only immigrants but also US citizens. Thank you very much for supporting us when you saw our videos and provided very valuable information, which you collected bit by bit. Without you, we probably wouldn't have gathered some parts because we couldn't even imagine how bad everything was. Well, and a special hello to Marina Sokolovskaya. I think we will meet and talk with you more than once, but under completely different circumstances. Thank you all! Bye, everyone!

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### CERTIFICATE OF TRANSLATION

*\*Translation from Russian into English\**

I, MIKHAIL BOGOMOLNY, A CERTIFIED COURT INTERPRETER (CALIFORNIA JUDICIAL COUNCIL ID: 313218), DO SOLEMNLY DECLARE UNDER THE PENALTY OF PERJURY, THAT TO THE BEST OF MY KNOWLEDGE AND BELIEF THE ENGLISH TRANSLATION OF THE ATTACHED DOCUMENT [VIDEO FILES TRANSCRIPTION] AS PRESENTED TO ME, EXECUTED IN THE RUSSIAN LANGUAGE IS TRUE, ACCURATE AND COMPLETE. I FURTHER DECLARE THAT I AM FLUENT IN ENGLISH AND RUSSIAN AND COMPETENT TO TRANSLATE TO AND FROM SAID LANGUAGES; BY ATTESTING TO THE ACCURACY OF THE ABOVE TRANSLATION I NEITHER VERIFY NOR DISPUTE THE ORIGIN OR FACTUAL CONTENT[S] OF THE SOURCE DOCUMENT; THE TRANSLATION FULLY CONFORMS TO THE SOURCE DOCUMENT [VIDEO FILES TRANSCRIPTION] EXECUTED IN THE RUSSIAN LANGUAGE ATTACHED HERETO.

#### DOCUMENT DESCRIPTION

##### **TRANSLATION OF VIDEO TRANSCRIPTIONS:**

- 1) *“Connection between Marina Sokolovskaya from the US and the Russian government. Who does the immigration consultant leak information to?”*
- 2) *US citizens work with Moscow / The Kremlin is online.*



X

Mikhail Bogomolny  
Translator

# **Exhibit 2**

**MIKHAIL BOGOMOLNY**  
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KISELEVILYA84

Posts

I'll defend my right to be a deputy in court, so that I can personally protect my beloved district from cynicism and arbitrariness! No one else would do it!

Photo street sign: 13 Tverskaya Str.

Photo poster text: I was disgracefully taken of the ballots. I will not give up!

Likes: 14

@kiselevilya84: You guys are awesome!!! Just awesome!! Finally, something fair has been done in the district! Well done! Get this filth out of the district!

@katcov.valery

@v.s.katkov

@govorit\_uvao

@vykhinofm

@podslushano\_vihinozhulepino

See all comments (3)

August 21, 2022

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#### DOCUMENT DESCRIPTION

*SOCIAL MEDIA POST OF @KISELEVILYA84*



Member ID: 3826

X

Mikhail Bogomolny  
 Translator

# **Exhibit 3**

# MIKHAIL BOGOMOLNY

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KISELEVILYA84

Posts

[Newspaper article photo]

Likes: 14

@kiselevilya84: Valera Katkov can't let it go :) The deputy was thrown out, and he still remembers me and tries to ride on my coattails!! The authorities did the right thing by kicking this scum out of the district, who was just leeching and profiting in a drunken stupor. This criminal should be thrown in the trash, and let a deserving person, of which there are many, take the place! This tumor must be removed, as I did in Kuzminsky Court almost a year ago.

@mossobyanin

@prefuvao

#elections #deputies #vykhino #zhulebino #SEAOMoscow

See all comments (3)

August 30, 2023

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#### DOCUMENT DESCRIPTION

*SOCIAL MEDIA POST OF @KISELEVILYA84*



Member ID: 3826

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Mikhail Bogomolny  
 Translator